

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES GROUP, LLC,
BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
PARA LONGEVITY 2018-3, LLC,
PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
ALTRAI GLOBAL, LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY, INC.,
SHPC HOLDINGS I, LLC,

Relief Defendants.

LEGAL NOTICE OF CLAIMS ADMINISTRATION PROCESS

IF YOU ARE A CURRENT CREDITOR OF ANY OF THE CONSENTING CORPORATE DEFENDANTS (COLLECTIVELY, THE “CORPORATE MONITORSHIP ESTATE”), OR IF YOU ARE A GRACE HOLDINGS NOTEHOLDER, YOU MAY BE ENTITLED TO PARTICIPATE IN MONETARY RECOVERY FROM THE ASSETS RECOVERED IN THIS ACTION.

SUBMISSION OF ALL CREDITOR CLAIMS TO THE CORPORATE MONITOR, AS DEFINED HEREIN, ARE DUE PURSUANT TO THE COURT’S ORDER ON OR BEFORE: **AUGUST 31, 2022.**

INTRODUCTION

On September 14, 2021, the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida (the “Court”) entered an *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the “September 14, 2021 Order”), thereby approving and appointing, *inter alia*, Daniel J. Stermer as the Corporate Monitor (the “Corporate Monitor”) for twenty-seven (27) entities and their affiliates, subsidiaries, successors, and assigns, until further Order of the Court (such proceeding, the “Corporate Monitorship”).¹

¹ Grace Holdings Financial, LLC is not one of the Consenting Corporate Defendants, is not one of the entities over which the Corporate Monitor has been appointed and as such, is outside of the Monitorship Estate. However, the Corporate Monitor has communicated with Grace Holdings Noteholders directly and in response to inquiries from the

On January 6, 2022, the Court entered an agreed order (the “January 6, 2022 Order” and, together with the September 14, 2021 Order, collectively, the “Appointment Orders”) expanding the scope of the Corporate Monitorship to include five (5) additional corporate entities (the twenty-seven (27) entities together with the five (5) additional entities are referred to as the “Consenting Corporate Defendants”).² The Appointment Orders, among other things, empowered the Corporate Monitor to marshal all assets of the Consenting Corporate Defendants, including locating, taking custody, possession and control of, safeguarding, and liquidating all such assets, and ensure fair and equitable repayment of creditors of the Consenting Corporate Defendants.

On June 17, 2022, the Corporate Monitor filed with the Court the *Corporate Monitor’s Unopposed Motion to Approve the Proposed Noticing and Claims Process*. On June 29, 2022, the Court entered the *Amended Agreed Order Approving the Noticing and Claims Administration Process* (the “Claims Procedure Order”), pursuant to which the “Eligible Claimants” (defined below) shall file the Proof of Claim Form attached hereto for recovery of such Eligible Claimant’s

Grace Holdings Noteholders.

When or if Grace Holdings will become part of the Monitorship Estate is subject to discussions between the Office of Financial Regulations and Grace Holdings and/or a future order of the Court. The Corporate Monitor cannot unilaterally take control of Grace Holdings and make it a part of the Monitorship Estate. Either Grace Holdings needs to consent/agree to same or the Court must enter an order determining same. Until either option occurs, the Corporate Monitor does not have authority over Grace Holdings.

However, the Corporate Monitor has been and continues to believe that the Noteholders who invested with Grace Holdings, the Grace Holdings Noteholders, should be a part of the Monitorship Estate and continues to seek a resolution so that the Grace Holdings becomes part of the Monitorship Estate but believes that the Grace Holdings Noteholders should be included in this proposed claims process in this matter even if Grace Holdings itself ultimately does not become part of the Monitorship Estate

² The Consenting Corporate Defendants include: NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, EMERALD ASSETS 2018, LLC, INTEGRITY ASSETS 2016, LLC, INTERGRITY ASSETS, LLC, PARA LONGEVITY 2014-5, LLC, PARA LONGEVITY 2015-3, LLC, PARA LONGEVITY 2015-5, LLC, PARA LONGEVITY 2016-3, LLC, PARA LONGEVITY 2016-5, LLC, PARA LONGEVITY 2018-3, LLC, PARA LONGEVITY 2018-5, LLC, PARA LONGEVITY 2019-3, LLC, PARA LONGEVITY 2019-5, LLC, PARA LONGEVITY 2019-6, LLC, PARA LONGEVITY VI, LLC, SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC, VALENTINO GLOBAL HOLDINGS, LLC, AMERITONIAN ENTERPRISES, LLC, SEEMAN-HOLTZ CONSULTING CORP., CENTURION ISG Holdings, LLC, CENTURION ISG Holdings II, LLC, CENTURION ISG (Europe) Limited, CENTURION ISG SERVICES, LLC, CENTURION ISG FINANCE GROUP, LLC, CENTURION FUNDING SPV I LLC, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

allowed claim against the Corporate Monitorship Estate. Upon collection, review, and allowance of timely and properly submitted Proofs of Claim, the Corporate Monitor intends to file a motion with the Court seeking (i) approval of a plan of distribution (the “Distribution Plan”), (ii) authority to create a settlement fund (the “Monitorship Fund”), and (iii) authority to distribute the proceeds of the Monitorship Fund in accordance with such Distribution Plan, after payment of administrative expenses of the Corporate Monitorship Estate as approved separately by the Court, to holders of claims deemed to be an “Allowed Claim” (defined below) by the Corporate Monitor.

LEGAL NOTICE

If you are a creditor of the Consenting Corporate Defendants, or are a Grace Holdings Noteholder, you may be an Eligible Claimant entitled to file a Proof of Claim, and you may have an Allowed Claim. Accordingly, you may be entitled to a *pro rata* distribution from the Monitorship Fund. If you are an Eligible Claimant, you must fill out and return the Proof of Claim Form enclosed herein to the Corporate Monitor in accordance with the instructions below **ON OR BEFORE AUGUST 31, 2022**.

Who is an Eligible Claimant?

Creditors are eligible to participate in the Claims Process, and are encouraged to submit a claim, if the Consenting Corporate Defendants and/or Grace Holdings Financial, LLC incurred a debt to them that remains unpaid in whole or in part. Such Creditors are “Eligible Claimants” in this Claims Process.

What is Required to Establish Existence of an Allowed Claim?

The claim of an Investor or Creditor will be allowed (an “Allowed Claim”), such that the Creditor will be entitled to receive a distribution based on the amount that Consenting Corporate Defendants and/or Grace Holdings still owe to the Creditor, provided that the Creditor sufficiently demonstrates to the satisfaction of the Corporate Monitor through documentation and/or sworn statements, among other things:

- i. That one or more of the Consenting Corporate Defendants and/or Grace Holdings incurred a debt to such Creditor, and such debt remains unpaid in whole or in part;

AND

- ii. that the total amount of funds that such Creditor paid to or on behalf of the Consenting Corporate Defendants and/or Grace Holdings exceeds the total amount of funds that the Consenting Corporate Defendants or their affiliates and/or Grace Holdings transferred back

to such Creditor, or that the total value of the goods or services that the Creditor provided to the Corporate Monitorship Estate exceeds the total amount that the Corporate Monitorship Estate paid to such Creditor for those goods and services.

The Corporate Monitor may consider other factors in determining whether a claim is an Allowed Claim.³

If a Creditor cannot prove both of the foregoing factors, that Creditor's claim will be disallowed and such Creditor will receive no monetary distribution on account of such alleged claim.⁴

If a Creditor makes the requisite showing regarding his/her/its claim and the Corporate Monitor determines that such claim is an Allowed Claim, then and only then, will the Creditor be entitled to a recovery from the Corporate Monitorship Estate. The Corporate Monitor will propose a method for monetary distribution to the Allowed Claims for approval by the Court after sufficient assets have been recovered and/or liquidated to warrant a distribution. To be clear, the calculations will be based upon the principal amount of money forwarded by the claimant to one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings which shall be reduced by any periodic payment(s) or other payment made by one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings and/or someone on behalf of one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings to the claimant, regardless of whether such payment was intended to be and/or identified as a periodic interest payment and/or return of principal. The Corporate Monitor will not include within his calculation for distributions any profit, rate of return, dividend, periodic interest or other payment in excess of the principal amount invested.

How Does an Eligible Claimant Submit a Claim?

To submit a claim and participate in the Claims Process and Distribution Plan, you must fill out and submit the Proof of Claim Form, attached to this Legal Notice and available: (i) upon email request to the Corporate Monitor and the Corporate Monitor's Counsel addressed to: dstermer@DSiconsulting.com with a copy to brich@bergersingerman.com (subject line: Request for Claims Package); and (3) on the Corporate Monitorship website, accessible at: <https://nationalseniormonitorship.com>.

The Proof of Claim Form requests information required to participate in the Claims Process and to receive a distribution from the Monitorship Fund if you are determined to have an Allowed

³ Notwithstanding these factors for determining whether a claim should be allowed, the Corporate Monitor will analyze each claim individually, the circumstances surrounding each Creditor's payment to and involvement with the Corporate Monitorship estate and each Creditor's dealings and relationship with the Consenting Corporate Defendants and/or Grace Holdings, and the Corporate Monitor reserves the right to object to and seek to disallow any claim.

⁴ To the extent a Creditor received funds from the Corporate Monitorship estate or another entity on behalf of the Corporate Monitorship estate on account of and in excess of the Consenting Corporate Defendants' and/or Grace Holdings total debt to such Creditor, such that the Creditor profited, meaning that the purported creditor actually received more money from the Consenting Corporate Defendants and/or Grace Holdings than they remitted to the Consenting Corporate Defendants and/or Grace Holdings, as opposed to being a "net loser", the Corporate Monitor reserves the right to pursue a claim against such creditor for the return of the profit received and any other appropriate relief and specifically reserves the right to pursue such a claim, known as a "claw-back".

Claim. You will be required to submit all requested supporting documentation with your Proof of Claim Form. Claims that lack requested supporting documentation will not be considered. For technical support in completing the Proof of Claim Form, please contact the Corporate Monitor by email to dstermer@DSIconsulting.com with a copy to brich@bergersingerman.com (please include subject line: “Technical Support for Claims Process”).

All Proof of Claim Forms must be returned to the Corporate Monitor **ON OR BEFORE August 31, 2022** by first class, U.S. Mail, together with all supporting documentation to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to dstermer@DSIConsulting.com. If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

TIMELINE FOR CLAIMS PROCESS

Fifteen (15) days from the date of the Order	Notice of Claims Process sent out by Corporate Monitor
August 31, 2022	Date by Which Submission of Claims is Required

Upon conclusion of the claims submission process, the Corporate Monitor will update the Court and all claimants regarding a proposed timeline for the adjudication of claims, which will include a post-adjudication process to request reconsideration of the Corporate Monitor’s determination of the allowance or disallowance, in whole or in part, of any particular Proof of Claim, as well as a process to appeal the Corporate Monitor’s final determination